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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

ORACLE USA, INC., a Colorado corporation;
 ORACLE AMERICA, INC., a Delaware
 corporation; and ORACLE INTERNATIONAL
 CORPORATION, a California corporation,

Plaintiffs,

v.

RIMINI STREET, INC., a Nevada corporation;
 SETH RAVIN, an individual,

Defendants.

Case No 2:10-cv-0106-LRH-PAL

**ORACLE'S MOTION TO SEAL
 PORTIONS OF ORACLE'S MOTION
 TO RE-DESIGNATE RIMINI'S 2006-
 2011 CUSTOMER LIST AS
 "CONFIDENTIAL INFORMATION"
 UNDER THE PROTECTIVE ORDER
 AND EXHIBITS TO THE
 DECLARATION OF NITIN JINDAL**

Pursuant to the Stipulated Protective Order governing confidentiality of documents entered by the Court on May 21, 2010, Dkt. 55 (“Protective Order”), Local Rules 10-5(b) and 16.1-4, and Rules 5.2 and 26(c) of the Federal Rules of Civil Procedure, Plaintiffs Oracle USA, Inc., Oracle America, Inc., and Oracle International Corporation (collectively “Oracle”) respectfully request that the Court grant leave to file under seal certain portions of Oracle’s Motion to Re-Designate Rimini’s 2006-2011 Customer List As “Confidential Information” Under The Protective Order and Exhibits 4 and 5 to the Declaration of Nitin Jindal in support of the same (the “Jindal Declaration”). These portions of Oracle’s motion and supporting documents reflect information that Rimini Street, Inc. (“Rimini”) has designated “Highly Confidential - Attorneys’ Eyes Only” under the Protective Order. Public, redacted versions of Oracle’s Motion to Re-Designate Rimini’s 2006-2011 Customer List As “Confidential Information” Under The Protective Order and the Jindal Declaration were filed on August 19, 2015, *see* Dkt. 703 and 705, and an unredacted version of each was subsequently filed under seal with the Court, *see* Dkt. 706-707.

The Protective Order states, “Counsel for any Designating Party may designate any Discovery Material as ‘Confidential Information’ or ‘Highly Confidential Information – Attorneys’ Eyes Only’ under the terms of this Protective Order *only if such counsel in good faith believes that such Discovery Material contains such information and is subject to protection under Federal Rule of Civil Procedure 26(c)*. The designation by any Designating Party of any Discovery Material as ‘Confidential Information’ or ‘Highly Confidential Information – Attorneys’ Eyes Only’ shall constitute a representation that an attorney for the Designating Party reasonably believes there is a valid basis for such designation.” Protective Order ¶ 2 (emphasis supplied).

Rimini has designated the following documents cited or referred to in Oracle’s Motion to Re-Designate Rimini’s 2006-2011 Customer List As “Confidential Information” Under The Protective Order as Highly Confidential - Attorneys’ Eyes Only (“HC”):

Jindal Decl. Ex.	Description	Designation
4	PTX 2502	HC
5	PTX 2547	HC

Oracle submits these documents under seal pursuant to the Protective Order based on Rimini's representation that it reasonably believes there is a valid basis under the Protective Order for its confidentiality designations. Because the documents were designated by Rimini, Oracle is not in a position to provide further justification for why filing them publicly would cause Rimini harm sufficient to show good cause.

Oracle has submitted all other portions of Oracle's Motion to Re-Designate Rimini's 2006-2011 Customer List As Confidential Information Under The Protective Order and supporting papers to the Court's public files, which allow public access to all materials except for the items discussed above. Accordingly, the request to seal is narrowly tailored. For the foregoing reasons, Oracle respectfully requests that the Court grant leave to file under seal the documents discussed above.

DATED: August 19, 2015

MORGAN, LEWIS & BOCKIUS LLP

By: /s/ Thomas S. Hixson
 Thomas S. Hixson
 Attorneys for Plaintiffs
 Oracle USA, Inc.,
 Oracle America, Inc.,
 and Oracle International Corp.